

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 22-80037-CR-AMC

UNITED STATES OF AMERICA

vs.

ALEXIS ENRIQUE TORRES MERCADO,

Defendant.

FACTUAL PROFFER

The United States and Alexis Enrique Torres Mercado (the “defendant”) agree that, had this case gone to trial, the United States would have proven the following facts, among others, beyond a reasonable doubt:

On March 19, 2020, the defendant submitted a passport application at the United States Post Office in West Palm Beach. In that application, the defendant represented himself as the victim, “L.V.” In support of his application, the defendant provided several items to prove his identity as “L.V.,” including a Florida driver’s license and a New York Birth Certificate—all in “L.V.’s” name.

In a post-*Miranda* statement, the defendant admitted that he bought “L.V.’s” identity documents for money with the intention to represent himself as “L.V.” The defendant further admitted that he did not buy the documents from “L.V.” nor has he ever met “L.V.”

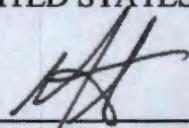
Law enforcement contacted L.V., who confirmed that s/he did not know the defendant and did not give him permission to possess the means of identification, *i.e.*, name, date of birth, and social security number.

The parties agree that these facts, which do not include all the facts known to the

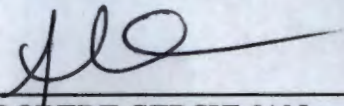
government and the defendant, are sufficient to prove beyond a reasonable doubt his guilt with respect to count 3, aggravated identity theft, in violation of Title 18, United States Code, Section 1028A(a)(1).

JUAN ANTONIO GONZALEZ
UNITED STATES ATTORNEY

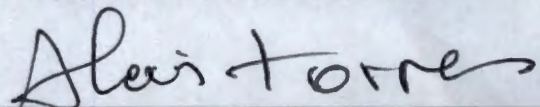
Date: 6/16/22

By: 
MICHAEL A. AUGUSTIN
ASSISTANT UNITED STATES ATTORNEY

Date: 6/16/22

By: 
ROBERT GERSHMAN
ATTORNEY FOR DEFENDANT

Date: 6/16/22

By: 
ALEXIS ENRIQUE TORRES MERCADO
DEFENDANT